United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 23-1179

September Term, 2023

USTC-10647-21L

Filed On: June 13, 2024

Alon Farhy,

Appellee

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Commissioner of Internal Revenue,

Appellant

Pillard and Wilkins, Circuit Judges; and Rogers, Senior Circuit **BEFORE:**

Judge

ORDER

Upon consideration of appellee's petition for panel rehearing filed on June 4, 2024, it is

ORDERED that the petition be denied.

Per Curiam

FOR THE COURT:

Mark J. Langer, Clerk

BY: /s/

> Daniel J. Reidy **Deputy Clerk**